

1 **RESNICK & LOUIS, P.C.**  
2 MELISSA J. ROOSE, ESQ.  
3 Nevada Bar No. 7889  
4 Joshua Y. Ang, ESQ.  
5 Nevada Bar No. 14026  
6 8925 West Russell Road, Suite 220  
7 Las Vegas, NV 89148  
8 [mroose@rlattorneys.com](mailto:mroose@rlattorneys.com)  
9 [jang@rlattorneys.com](mailto:jang@rlattorneys.com)  
10 Telephone: (702) 997-3800 / Facsimile: (702) 997-3800  
11 *Attorney for Cool Freight Express, Inc.*  
12 *and Tarandeep Singh*

8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARTIN ORTIZ,

12 Plaintiff,

13 vs.

14 COOL FREIGHT EXPRESS, INC.,  
15 TARANDEEP SINGH, DOES 1 - 10, and  
16 ROE CORPORATIONS 1 - 10, Inclusive,

17 Defendants.  
18

CASE NO.: 3:20-cv-00629-MMD-CLB

**MOTION AND NOTICE TO  
REMOVE/ADD COUNSEL OF  
RECORD FOR DEFENDANTS AND  
TO ADD/REMOVE FROM THE  
ELECTRONIC SERVICE LIST**

19  
20 **TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

21 PLEASE TAKE NOTICE that Defendants, COOL FRIEGHT EXPRESS, INC. and  
22 TARANDEEP SINGH, hereby move this Honorable Court and provide notice that HEATHER  
23 CALIGUIRE FLEMING, ESQ. is no longer associated as counsel of record for Defendants in  
24 this matter as her last day of employment at RESNICK & LOUIS, P.C. is on or about  
25 December 23, 2020 wherein removal from the electronic service list must follow.

26 PLEASE ALSO TAKE NOTICE that Defendants, COOL FRIEGHT EXPRESS, INC.  
27 and TARANDEEP SINGH, hereby move this Honorable Court and provide notice that  
28

1 JOSHUA Y. ANG, ESQ. is associated as counsel of record for Defendants in this matter and  
2 added to the electronic service list.

3 As delineated herein, RESNICK & LOUIS, P.C. will continue to serve as counsel for  
4 Defendants, COOL FREIGHT EXPRESS, INC. and TARANDEEP SINGH, in this action  
5 through their attorneys MELISSA J. ROOSE, ESQ. and JOSHUA Y. ANG, ESQ. as counsel of  
6 record.

7 All items including, but not limited to, pleadings, papers, correspondence, documents,  
8 and future notices in this action should be directed to MELISSA J. ROOSE, ESQ. and  
9 JOSHUA Y. ANG, ESQ. of RESNICK & LOUIS, P.C. as counsel of record for Defendants,  
10 accordingly.

11  
12 DATED this 23<sup>rd</sup> day of December 2020. Respectfully Submitted:

13 **RESNICK & LOUIS, P.C.**

14 */s/ Melissa J. Roose, Esq.*

15 \_\_\_\_\_  
16 MELISSA J. ROOSE, ESQ.  
17 Nevada Bar No. 7889  
18 JOSHUA Y. ANG, ESQ.  
19 Nevada Bar No. 14026  
20 8925 West Russell Road, Suite 220  
21 Las Vegas, NV 89148  
22 *Attorneys for Defendants*  
23 *Cool Freight Express, Inc. and*  
24 *Tarandeep Singh*

25 **IT IS SO ORDERED:**

26   
27 \_\_\_\_\_  
28 UNITED STATES MAGISTRATE JUDGE

DATED: December 29, 2020

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing **MOTION AND NOTICE TO REMOVE/ADD COUNSEL OF RECORD FOR DEFENDANTS AND TO ADD/REMOVE FROM THE ELECTRONIC SERVICE LIST** was served this 23<sup>rd</sup> day of December, 2020, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to FRCP 5(b). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date PURSUANT TO 28 U.S. CODE § 1446 with the Clerk of Court for the United States District Court, District of Nevada, by using the CM/ECF system.

Curtis B. Coulter, Esq.  
Brent Harsh, Esq.  
Karl H. Smith, Esq.  
COULTER HARSH LAW  
403 Hill Street  
Reno, NV 89501  
*Attorneys for Plaintiff*

/s/ Luz T. Macias  
An Employee of Resnick & Louis, P.C.